

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ Delta, LLC,  
*Plaintiff,*

v.

CommScope Holding Company, Inc., *et al.*,  
*Defendants.*

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED

**DECLARATION OF TY WILSON**

I, Ty Wilson, state as follows in support of Plaintiff TQ Delta, LLC's Response to the CommScope Defendants Motion for Partial Summary Judgment Regarding Prior Art:

1. I am an attorney at the Davis Firm, PC and counsel of record for TQ Delta, LLC. I am a member of good standing of the State Bar of Texas. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit A contains true and correct highlighted excerpts of the Rebuttal Expert Report of Dr. Todor Cooklev, served in this case and dated November 18, 2022.
3. Exhibit B is a true and correct copy of Defendants' Answer Claim Construction Brief served in the case *TQ Delta, LLC v. 2Wire, Inc.*, Civil Action No. 13-cv-1835 (D. Del.) on October 18, 2017.
4. Exhibit C is a true and correct highlighted copy of a webpage regarding ITU-T and TSB documentation that may be found at <https://www.itu.int/en/ITU-T/info/Pages/documentation.aspx>.
5. Exhibit D is a true and correct highlighted copy of a webpage regarding ITU-T Study Group 15 that may be found at <https://www.itu.int/ITU-T/2001-2004/com15/index.asp>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of January, 2023, in Dallas, Texas.

**/s/ Ty Wilson**  
Ty Wilson